



**JOHN M. STRAVATO
ATTORNEY AT LAW**

The time for Mr. Stravato to respond to the Order to Show Cause (ECF No. 27) is extended to **Monday, November 13, 2023**.

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SO ORDERED.

Jennifer H. Rearden, U.S.D.J.
Date: November 3, 2023

November 2, 2023

Filed via ECF

Hon. Jennifer H. Rearden
Southern District of New York Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1010
New York, NY 10007

**Re: DeZign NA, LLC, et al. v. Seamless Capital Group LLC, et al.
Case No. 1:22-cv-10098-JHR**

Dear Judge Rearden:

The undersigned counsel hereby submits this letter motion, pursuant to Your Honor's Individual Rules and Practices in Civil Cases, to respectfully request a ten (10) day extension of time to respond to this Court's October 25, 2023 Order to Show Cause [Doc. No. 27].

First, undersigned counsel certainly recognizes the seriousness of the assertions by Mr. Ritter, on behalf of the Plaintiffs herein. However, the undersigned is currently working to resolve what counsel believes to have been the result of communication issues and misunderstandings between undersigned counsel and his client(s) which should have been resolved without the need for intervention from this Court. The undersigned absolutely apologizes to the Court that it has reached this point.

Before providing a full substantive response to the issues, I respectfully seek ten (10) days to continue efforts toward a resolution directly with Mr. Ritter. The undersigned desires to continue to seek a resolution with Mr. Ritter and to avoid exposing certain details to the Court

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and/or to the public (with submissions filed on the docket) which could include potentially highly prejudicial confidential communications between counsel and his client/former client. These details would likely affect Mr. Ritter's substantive claims, defenses and case strategy pertaining to the named defendants in this case should this case were to be re-filed in this or another jurisdiction.

If an understanding and resolution cannot be reached with Mr. Ritter, undersigned counsel will provide a substantive response to the order to show cause. If an agreement can be reached, however, perhaps the undersigned and Mr. Ritter could provide a joint explanation that will not expose potentially highly prejudicial confidential communications.

This is the first extension sought on this matter. The extension would adjourn the response deadline from November 3, 2023 to November 13, 2023. This case is dismissed and this extension would not affect any other deadlines in the case.

In advance, I thank the Court for its consideration of this request and I am very apologetic that the Court needed to become involved in this attorney-client issue.

Respectfully submitted,

s/ John M. Stravato, Esq.

John M. Stravato, Esq.